

Via Facsimile and U.S. Mail  
Mail Stop 6010

August 2, 2006

Mr. Brian M. O'Hara  
President and Chief Financial Officer  
XL Capital Ltd.  
XL House, One Bermudiana Road  
Hamilton, Bermuda HM 11  
Cayman Islands

**Re: XL Capital Ltd.**  
**Form 10-K for the Fiscal Year Ended December 31, 2005**  
**Filed March 7, 2006**  
**File No. 001-10804**

Dear Mr. O'Hara:

We have completed our review of your Form 10-K and have no further comment at this time.

Sincerely,

Jim Atkinson  
Accounting Branch Chief